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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VOLUNTEER CROSSING, LLC, a Nevada
limited liability company,

Plaintiff,

vs.

COUNTY OF CLARK, a political subdivision
of the State of Nevada; and 32 ACRES, LLC,
a Nevada limited liability company,

Defendants.

Case No. 2:24-cv-01433-APG-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

(First Request)

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and LR IA 6-1, Plaintiff Volunteer Crossing, LLC (“Plaintiff”) and Defendants County of Clark (“Clark County”) and Third-Party Defendant 32 Acres, LLC (“32 Acres”), hereby agree and stipulate, as follows:

1. Clark County filed its pending Motion for Expedited Summary Judgment on January 14, 2025 (ECF No. 29) (the “Motion”). 32 Acres filed its Joinder to the Motion on January 16, 2025. (ECF No. 30.)

2. Shortly before the Motion was filed, Plaintiff’s lead counsel Thomas W. Davis, III, passed away on January 2, 2025.

3. In light of Mr. Davis’s passing and the resulting reorganization of duties and responsibilities between and amongst Plaintiff’s counsel that has followed, Plaintiff has requested, and Clark County and 32 Acres have agreed, to extend the due date for Plaintiff’s response to the Motion by two weeks, from February 4, 2025, to February 18, 2025.

4. In addition, the parties have also agreed to extend the due date for Clark County’s

and for 32 Acres' replies by one week, such that Clark County's and 32 Acres' replies shall each be due 14 days from the date Plaintiff files and serves its response to the Motion.

5. Further, on January 30, 2025, Plaintiff proposed mediation as a means to quickly resolve this case. The requested extension will allow the parties time to consider Plaintiff's proposal while, at the same time, allow briefing and/or mediation to continue.

6. The parties agree that the foregoing constitutes good cause and respectfully request the Court's permission to extend the briefing schedule.

IT IS SO AGREED AND STIPULATED:

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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: February 3, 2025